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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RICHARD GIBSON, and HERIBERTO
VALIENTE,

Plaintiffs,

v.

MGM RESORTS INTERNATIONAL,
CENDYN GROUP, LLC, THE RAINMAKER
GROUP UNLIMITED, INC., CAESARS
ENTERTAINMENT INC., TREASURE
ISLAND, LLC, WYNN RESORTS
HOLDINGS, LLC,

Defendant.

Case No. 2:23-cv-00140-MMD-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANT THE RAINMAKER
GROUP UNLIMITED, INC. TO
RESPOND TO THE COMPLAINT
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Richard Gibson and
Heriberto Valiente (“Plaintiffs”) and Defendant The Rainmaker Group Unlimited, Inc.

(“Defendant”), by and through their respective counsel and pending the Court’s approval, that Defendant shall have an additional nineteen days to answer or otherwise respond to the Complaint [ECF No. 1]. Defendant’s original response deadline is March 8, 2023. With an additional nineteen days, Defendant’s deadline to respond to the Complaint is extended to March 27, 2023, and will align with the parties’ stipulated deadline to respond to the Complaint for the remaining defendants in the case. In the event that Defendant moves to dismiss the Complaint, the parties shall meet and confer and thereafter submit to the Court a mutually agreeable schedule for further briefing on any such motion.

Good cause exists for the extension set forth herein. Defense counsel were only recently retained in this matter and require additional time to determine how best to address Plaintiffs’ Complaint. This is the first extension requested for Defendant to respond to the Complaint and is not made for the purpose of delay.

Dated: March 8 2023.

/s/ Nicholas J. Santoro

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IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

Dated: _____